

EXHIBIT 6
SOUGHT TO BE FILED
UNDER SEAL

From: Werner, Tom
Sent: Friday, September 15, 2023 5:41 AM
To: Park, Ryuk
Cc: Krishnan, Vivek; Winston-Micron-Netlist; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel; jtruelove@mckoolsmith.com; #Netlist-Micron [Int]; Barr, Thomas; 'Aashik Padmanabhachary'
Subject: RE: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) - Missing HBM Discovery
Importance: High

Ryuk,

Please respond this morning with Micron's availability. Expert reports are due in just a few days.

Please also immediately produce the documents [REDACTED]
[REDACTED]

Very truly yours,

Thomas C. Werner, Esq.
Discovery Counsel
Irell & Manella LLP
1800 Avenue of the Stars
Suite 900
Los Angeles, CA 90067-4276
TWerner@irell.com
(310) 203-7956 (direct)
(he/him/his)

From: Werner, Tom <TWerner@irell.com>
Sent: Thursday, September 14, 2023 2:44 PM
To: Park, Ryuk <RPark@winston.com>
Cc: Krishnan, Vivek <VKrishnan@winston.com>; Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int] <Netlist-Micron@irell.com>; Barr, Thomas <TBarr@irell.com>
Subject: RE: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) -

Ryuk,

Please advise when your folks are available for the discussion of where Micron asserts the relevant documents are located, as discussed during today's L&L M&C.

Very truly yours,

Thomas C. Werner, Esq.
Discovery Counsel
Irell & Manella LLP
1800 Avenue of the Stars

Suite 900
Los Angeles, CA 90067-4276
TWerner@irell.com
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From: Sheasby, Jason <JSheasby@irell.com>
Sent: Wednesday, September 13, 2023 3:27 PM
To: Park, Ryuk <RPark@winston.com>
Cc: Krishnan, Vivek <VKrishnan@winston.com>; Werner, Tom <TWerner@irell.com>; Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int] <Netlist-Micron@irell.com>
Subject: Re: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) -

Ryuk

What you wrote is not correct. We intend to move to compel and seek an evidentiary sanction.

[REDACTED]. If you believe otherwise point to the document and explain why.

Best
JS

On Sep 13, 2023, at 3:03 PM, Park, Ryuk <RPark@winston.com> wrote:

Jason,

The designs we have made available for inspection contain [REDACTED]
[REDACTED]

It is unclear what [REDACTED]
[REDACTED]

Thanks,

Ryuk

Ryuk Park

Of Counsel

Winston & Strawn LLP

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<image001.jpg>

From: Sheasby, Jason <JSheasby@irell.com>

Sent: Tuesday, September 12, 2023 5:23 PM

To: Krishnan, Vivek <VKrishnan@winston.com>; Werner, Tom <TWerner@irell.com>; Park, Ryuk <RPark@winston.com>

Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int] <Netlist-Micron@irell.com>

Subject: Re: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) -

There are still missing materials that should have been supplied. They relate to at least HBM2E, but may also relate to HBM3. We need the data sufficient to fully disclose

[REDACTED]

[REDACTED]

Please confirm this information will be provided by Thursday. If you cannot do so we request a lead to lead tomorrow.

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